

December 19, 2025

Mr. Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
1 Promenade du Portage
Gatineau, QC K1A 0N2

By: Intervention Comment Form

Subject: Reply Comments – Telecom and Broadcasting Notice of Consultation CRTC 2025-180, Call for comments – Improving the public alerting system

1. The Canadian Telecommunications Association (“CTA”) is pleased to provide the following reply comments on behalf of its Members in relation to this important consultation.
2. It should be noted that an absence of a response to elements identified in the Consultation or within the comments of other interveners should not be interpreted as agreement or disagreement with such proposals. Further, to the extent that there is any inconsistency between our submission and that of an Association Member in this consultation, the submission of such member shall prevail with respect to its position on the relevant matter.
3. We reserve the right to provide further comments in the final stages of this proceeding.

Introduction

4. A review of the 104 interventions filed to-date identify that public alerting is an important topic for Canadians at large. While many provided thoughtful comments and recommendations, there is also a misunderstanding of what this proceeding is likely to bring forward in terms of solutions.

Established regulatory framework in place for Wireless Service Providers (WSP)

5. Canadians' ability to receive life saving services, including those provided via the public alerting systems, are made possible because of the chain of stakeholders involved in the process.
6. Alerts are developed and issued by designated provincial, territorial and federal government organizations and emergency management officials, collectively referred to as alert issuers. Content of the message, the languages used, the format of the message and the timing/destination of the alert, are solely under the purview of the alert issuer.
7. Alerts are pushed out to Canadians via the National Alert Aggregation and Dissemination (NAAD) System which is operated by Pelmorex. The NAAD system allows for the secure delivery of the alert message from the alert issuer to the last mile distributors (LMDs) following defined technical standards.
8. LMDs, also referred to as alert distributors, include tv, radio, cable/satellite and WSPs. LMDs have regulatory obligations for the delivery of the alert message, as received from the alert issuer to Canadians over their respective platforms.
9. In this chain, the Commission's authority is limited to LMDs. What this means, from a very practical perspective, is that alert issuers are not required to abide by decisions that are driven by this consultation process.
10. Assuming that alert issuers want to make changes, there are already mechanisms in place for this to occur via the Federal Provincial and Territorial Senior Officials Responsible for Emergency Management (SOREM), the FPT Public Alerting Working Group, as well as the Alerting Technical Working Group (ATWG).
11. Ultimately, SOREM will undertake any necessary reviews and provide direction to other stakeholders, including Pelmorex and WSPs, concerning items they would like to implement.
12. As part of the SOREM process, WSPs would expect to provide feedback concerning feasibility, as necessary, ensure that relevant testing was undertaken to equipment (for example, BMCs), and that timing for implementation was realistic and understood.

13. WSPs are already obligated, as a condition of service,¹ to deliver alerts to LTE devices via the cell broadcast system and, as such, no additional regulatory intervention is necessary, nor warranted.

On device message delivery

14. WSPs, for the purposes of alerting, are “dumb pipes”. This means that when they receive an alert, the message is simply passed through in whatever language or format is used by the alert issuer. Where links are included in messages by alert issuers, WSPs will pass these along to their mobile end users.

15. As of 2019 all devices sold in Canada by WSPs² are wireless public alerting (WPA) compatible. This means that anyone with a WPA compatible device capable of connecting to an LTE network and equipped with the latest version of its operating software, is capable of receiving an alert.

16. All WPA compatible devices meet the appropriate standards to ensure that alerts are delivered using the proper alerting tone, and vibration.³

17. Persons with disabilities, or those requiring accessibility supports, are able to configure their individual devices using the multiple built-in accessibility features to better meet their needs.

18. Consultations with disability groups across multiple different CRTC proceedings⁴ have consistently identified that the needs of each user are specific to them, therefore, it becomes extremely challenging to develop universal “accessibility” settings that would

¹ Identified at paragraph 13 of **Telecom Regulatory Policy CRTC 2017-91, Implementation of the National Public Alerting System by wireless service providers to protect Canadians (“TRP CRTC 2017-91”).**

² Devices certified by a Canadian WSPs will be programmed in such a way as to be operational on that Canadian network. Devices that are purchased in other countries and brought in to Canada – which are referred to as “grey market devices” – may not comply with Canada’s wireless equipment standards.

³ As identified by **Common Look and Feel Guidance Version 2.1**, <https://www.publicsafety.gc.ca/cnt/mrgnc-mngmnt/mrgnc-prprdncs/npas/clf-Ing-20-en.aspx>.

⁴ As the Commission is aware, CTA has facilitated consultations between WSPs and accessibility groups since 2017 concerning a variety of topics. In addition, CTA undertakes a variety of consultative activities on behalf of its members. For example, this includes consultations that occurred in respect to CRTC and Government of Canada proceedings: **Telecom Regulatory Policy CRTC 2018-466, Review of the regulatory framework for text-based message relay services; Telecom Regulatory Policy CRTC 2023-41, Mobile wireless service plans that meet the needs of Canadians with various disabilities; Telecom Regulatory Policy CRTC 2025-54, Review of video relay service;** as well as the various processes in relation to the **Accessible Canada Act**.

be applicable in all instances. Information about specific features is included in wireless device user manuals.

19. Any required changes to either support how alerts are received on devices or to meet specific accessibility needs are outside the scope of this proceeding as the Commission does not have authority over device manufacturers.

Network coverage

20. According to the Commission's most recent ***Communications Market Report***, at the end of 2023, 99.5% of the Canadian population has access to LTE coverage.⁵ The Commission measures coverage using the percentage (%) of homes, businesses and major transportation roads that have access to the mobile wireless technology.
21. It is important to stress that the vast majority of Canadians have access to LTE coverage. Substantial progress has been made in ensuring access to LTE networks across Canada. Having said this, it is understood that gaps exist and, as the Commission is aware, work is currently underway to augment coverage.
22. As identified within its **Departmental Sustainable Development Strategy Report**,⁶ the Commission further notes a target of 100% by December 2026 (percentage of households that have access to the latest mobile wireless technology).
23. Nothing has been put on record that provides evidence identifying that the Commission's original views⁷ regarding the use of pre-LTE networks for alerting were wrong or require remediation. Any discussions to include 3G technology for alert distribution is both counterproductive to the progress being made, and counterintuitive to the targets in place.

⁵ Per the report, LTE Coverage (at the end of 2023): All of Canada: 99.5%; Rural Areas: 96.4%; Territories: 97.5%; First Nations Reserves: 88.7%; Major Roads and Highways: 86.6%.

⁶ Available: <https://web.crtc.gc.ca/eng/publications/reports/stratdev23-24.htm>

⁷ **Telecom Regulatory Policy CRTC 2017-91, Implementation of the National Public Alerting System by wireless service providers to protect Canadians**, paragraph 18 [emphasis added]: "The Commission stated in *Telecom Regulatory Policy 2016-496* that "the latest generally deployed mobile wireless technology [LTE technology] should be available in Canada not only in premises, but on as many major transportation roads as possible" and announced a fund to help support the continued rollout of these technologies in underserved areas. **The Commission is of the view that exempting pre-LTE networks from WPA requirements will have minimal impact on the coverage of emergency alerting. Conversely, requiring WPA on pre-LTE networks would increase deployment costs and delay the deployment of emergency alerts over wireless networks.**"

Alerting app

24. CTA holds no views as to whether a national mobile app should be developed or what the app's role should be within the overall public alerting system hierarchy.
25. Alert issuers are best placed to understand the usefulness of an app to their constituents and the utility of an app to their operations.
26. As previously noted, the development of a national mobile app has been raised within the Pelmorex Governance Council. Further discussions concerning whether an app is necessary should either continue there or within a similar venue.
27. WSPs would look to provide feedback during this discussion to the degree that it is necessary or warranted.

Conclusion

28. It is clear from the record of the proceeding that there is an interest amongst all stakeholders to ensure a well functioning and reliable public alerting system exists.
29. However, it is also equally clear that many of the elements put forward fall outside the scope of the Commission and need to be addressed from that perspective.
30. CTA also notes that, in the most recent federal budget, the Government of Canada announced funding to renew the National Public Alerting System. This investment underscores that meaningful enhancements to Canada's public alerting ecosystem are being contemplated and led by governments and emergency-management authorities, rather than through regulatory changes imposed on LMDs.
31. In closing, CTA continues to appreciate being able to share its views as part of this proceeding.

Kind regards,



Ursula Grant,
VP Industry and Consumer Affairs